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12 IN THE UNITED STATES DISTRICT COURT  
13  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
14  
SAN FRANCISCO DIVISION

16 UNITED STATES,

Case No. CR-21-00162-WHO

17 Plaintiff,

**STIPULATION TO CONTINUE  
STATUS CONFERENCE/CHANGE OF  
PLEA FROM OCTOBER 23, 2025 AT  
1:30 P.M. TO DECEMBER 11, 2025,  
AT 1:30 P.M. AND EXCLUDE TIME  
UNDER THE SPEEDY TRIAL ACT;  
AND ORDER**

18 v.

19 BABAK BROUMAND AND  
20 MALAMATENIA MAVROMATIS,

21 Defendants.

24  
STIPULATION

25  
The parties hereby stipulate that the currently set status conference/change of plea be  
26 continued from October 23, 2025, at 1:30 p.m. to December 11, 2025, at 1:30 p.m.  
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STIPULATION AND [PROPOSED] ORDER  
*United States v. Broumand, et al;*  
Case No. CR-21-00162-WHO

1       1. Defendant BABAK BROUMAND is in custody of the Bureau of Prisons in  
2 Alabama after being convicted at jury trial in the related case of *United States v. Broumand*, 20-  
3 224-RGK(A).

4       2. The government has produced over 60,000 pages of discovery to defendant  
5 MAVROMATIS, which primarily consists of business records, including bank, credit card,  
6 mortgage broker, title company, and escrow company records, tax returns, and witness  
7 interview reports.

8       3. On March 24, 2022, the government obtained a superseding indictment in this  
9 case adding defendant MAVROMATIS, who first appeared in this case on April 19, 2022, in  
10 which she was charged with two counts of False Statements on a Loan Application in  
11 violation of 18 U.S.C. § 1014 (Counts Four and Six). Prior to defendant MAVROMATIS's  
12 indictment, co-defendant BABAK BROUMAND had already been charged.

13       4. The parties have reached an agreement on a proposed resolution for both  
14 defendant Broumand and defendant Mavromatis. The government has filed the plea  
15 agreement for defendant Broumand. (Dkt. 61.) The government will be recommending  
16 diversion for defendant Mavromatis; Pretrial services has conducted an evaluation and  
17 concurs in the recommendation of diversion.

18       5. On October 21, 2025, defendant Mavromatis signed a diversion agreement with  
19 the government, pursuant to a yet unfiled charging document—a First Superseding  
20 Information. On October 1, 2025, the federal government underwent a lapse in funding (the  
21 “Government Shutdown”). The assigned Special Assistant United States Attorneys, who are  
22 principally assigned to the Central District of California, are required to travel in order to  
23 appear on behalf of the government in this case. Given the Government Shutdown,  
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1 government funded travel is currently restricted. Further, defense counsel for defendant  
2 Mavromatis needs additional time to review and discuss the yet unfiled First Superseding  
3 Information with his client. Additionally, counsel and the government require additional  
4 time to schedule arraignment of Ms. Mavromatis on the First Superseding Information.  
5 Accordingly, in addition to the reasons outline below, the government and defense counsel  
6 agree that time is excludable because of the Court's "consideration...of [the] proposed plea  
7 agreement to be entered into by the [parties]." 18 U.S.C. § 3161(h)(1)(G).

8  
9 6. Therefore, the parties stipulate and agree that excluding time until December 11,  
10 2025, will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).  
11 The parties further stipulate and agree that the ends of justice served by excluding the time  
12 from October 23, 2025, through December 11, 2025, from computation under the Speedy Trial  
13 Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §  
14 3161(h)(7)(A), (B)(iv).  
15

16 7. Accordingly, the parties ask that the Court to continue the status conference/change  
17 of plea to December 11, 2025, since that is the date the parties are soonest available that  
18 provides sufficient time for the First Superseding Information to be filed, government travel to  
19 be arranged, and the arraignment to held, as referenced above.

20 9. The undersigned Special Assistant United States Attorneys certify that they have  
21 obtained approval from all counsel to file this stipulation and proposed order.  
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23 IT IS SO STIPULATED.  
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25  
26 DATED: October 21, 2025

/s/ Juan M. Rodriguez  
MICHAEL J. MORSE  
JUAN M. RODRIGUEZ  
Special Assistant United States Attorney

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28 STIPULATION AND [PROPOSED] ORDER  
*United States v. Broumand, et al;*  
Case No. CR-21-00162-WHO

1  
2 DATED: October 20, 2025

/s/Steven F. Gruel  
3 STEVEN F. GRUEL  
4 Counsel for Defendant BROUMAND

5 DATED: October 20, 2025

/s/Paul H. Nathan  
6 PAUL H. NATHAN  
7 Counsel for Defendant MAVROMATIS

8 ORDER

9 Based upon the facts set forth in the stipulation of the parties and for good cause shown,  
10 the Court hereby continues the status conference from October 23 2025, at 1:30 p.m. to  
11 December 11, 2025, at 1:30 p.m.

13 Furthermore, the Court finds that failing to exclude the time from October 23, 2025  
14 through December 11, 2025, would unreasonably deny defense counsel and the defendant the  
15 reasonable time necessary for effective preparation, taking into account the exercise of due  
16 diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

18 The Court further finds that the ends of justice served by excluding the time from  
19 October 23, 2025, through December 11, 2025, from computation under the Speedy Trial Act  
20 outweigh the best interests of the public and the defendants in a speedy trial. Therefore, and  
21 with the consent of the parties.

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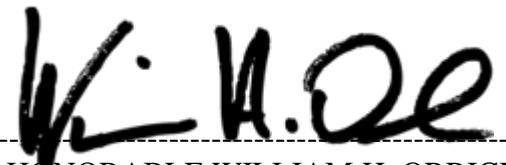
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STIPULATION AND [PROPOSED] ORDER  
*United States v. Broumand, et al;*  
Case No. CR-21-00162-WHO

1 IT IS HEREBY ORDERED that the time from October 23, 2025, to December 11,  
2 2025, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §§  
3 3161(h)(1)(G), (h)(7)(A), (B)(iv).  
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6 IT IS SO ORDERED.  
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8 DATED: October 22, 2025  
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HONORABLE WILLIAM H. ORRICK  
United States District Court